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November 16, 2004

COURIER

Alva E. Smith, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 5546

Progress for America Voter Fund
Progress for America, Inc.
Brian McCabe
Mary Anne Carter
Ralph R. Brown

Dear Ms. Smith:

This responds to the complaint filed against our clients, Progress for America Voter Fund, Progress for America, Inc. and the other respondents named above (collectively "Respondents"), in MUR 5546. The Respondents deny each allegation made against them in the complaint.

The complaint fails to cite any evidence that the Respondent's activities were coordinated with either Bush-Cheney '04, Inc. or the Republican National Committee ("RNC"). In fact, an objective, common sense reading of the complaint reveals that it is based upon conjecture, and at best, innuendos that do not provide any factual or legal basis for proceeding with an investigation of this matter. *See, e.g.*, Compl. at 3 (citing a press release that was publicly distributed as evidence of coordination). Accordingly, the Commission must dismiss the complaint and take no further action.

Respectfully submitted,

Benjamin L. Ginsberg
William J. McGinley
Glenn M. Willard

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